

REMARKS/ARGUMENTS

Claim Rejections

Rejection under 35 U.S.C. §102

The examiner has rejected claims 1, 3-5, 7-9 and 15 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Serial No. 5,303,388, by Kreitman et al.

Claim 1 has been further amended to more particularly point out that selection of an active region will activate a document *content* editing function, which performs editing of document content or structure rather than icon manipulation or document information as is disclosed by Kreitman et al. Kreitman et al do not teach any method of document *editing* whatsoever. The icon disclosed by Kreitman et al simply displays information relevant to a document. It does not enable editing of the actual document, particularly the content of the document. The only manipulation or editing disclosed by Kreitman et al is a manipulation or editing of the information displayed by the icon. Kreitman teaches editing an icon to display various combinations of information relevant to a document or folder, however a document including its content or structure cannot be changed with the icon of Kreitman et al. In contrast, claim 1 describes a method of actually editing a document including its content or structure, such as page reordering, page deletion and other functions. These functions result in a change in the file itself, not just the information that is displayed in relation to the file. Consequently, the examiner's rejection of claim 1 does not present a *prima facie* case of anticipation and this rejection should be reconsidered.

Claims 3-5, 7-9 which are dependent thereon and contain all the limitations of claim 1 are allowable for the reasons pointed out for claim 1.

Claim 3 has also been rejected as anticipated under Kreitman et al because the examiner is under the impression that Kreitman et al discloses an icon comprising “a reduced image of said document page.” Kreitman et al discloses an icon comprising “a standard two-dimensional image 27 corresponding to the type of object being represented by the icon” (col. 3, lines 51-52). This is not an image of the actual document page that can be recognized by a user or that can reveal something about the document content, it is simply a standard image in the form of a generic page. Claim 3 claims “a reduced image of *said* document page.” Accordingly claim 3 is patentable for additional reasons beyond those presented for claim 1.

Claim 15 is dependent on claim 13, which has been amended to more clearly describe a page editing embodiment in which the order of pages is changed. Kreitman et al. do not teach all the elements of claim 13 or claim 15. Kreitman et al., the other cited prior art references and combinations thereof do not teach an icon wherein “each of said object images representing a page in a document …” as claimed in claim 13 or “functions which change the order of said pages in said document.” Object elements in cited prior art references represent documents or files, but do not represent editable sub-elements within those files or documents, such as pages or image frames. This distinctive difference allows embodiments of the present invention to provide document editing functions, such as page or frame reordering, page or frame deletion, page or frame copying and other functions and hence represents a distinctive, novel and functional difference from the prior art references.

Rejections under 35 U.S.C. §103

Claims 2, 10-12, 14, 16 and 17 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 751,287 by Hahn et al. As stated above, claim 1 has been amended to more particularly point out that selection of an active region will activate

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a document *content editing* function, which performs editing of document content rather than simple document manipulation or information display. This function is not enabled by any combination of the cited prior art references. Claims 2 & 10-12, which are dependent on and contain all the limitations of claim 1 are allowable for the reasons pointed out for claim 1 above in relation to that anticipation rejection. The same reasons apply to this obviousness rejection because Hahn et al do not disclose any form of document editing function either. As cited by the examiner, Hahn et al disclose only a system for *organizing* documents (col. 2, lines 45-46), which is not actual editing of file content.

Claims 14, 16 and 17 (as amended) are dependent on claim 13, which has been amended to more clearly describe the editing function of the claimed invention. Claim 13, and claims dependent thereon, now comprise the limitation of “functions which change the order of said pages in said document.” This element is not found in Kreitman et al., in combination with Hahn or any other cited prior art reference. Object elements in cited prior art references represent documents or files, but do not represent editable sub-elements, such as pages or image frames, within those files or documents. This distinctive difference allows embodiments of the present invention to provide document editing functions, such as page or frame reordering, page or frame deletion, page or frame copying and other functions and hence represents a distinctive, novel and functional difference from any combination of the prior art references.

Claims 14-17 have been amended to change their dependency from claims 9 and 11 to claims 13 and 15 as noted in the listing of claims. These amendments are made to correct typographical errors in the original application.

Claim 6 has been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of Microsoft® Windows NT, version 4.0 (Microsoft) © 1981-1999 Microsoft Corp. As

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stated above, claim 1 has been amended to more particularly point out that selection of an active region will activate a document *content* editing function, which performs editing of a document rather than simple document manipulation. This function is not enabled by any combination of the cited prior art references. Claim 6 which is dependent thereon and contains all the limitations of claim 1 is allowable for the reasons pointed out for claim 1 as the Microsoft reference does not teach this element either.

Claims 13, 18, 19, 22, 25 and 26 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 905,992 by Lucas et al.

Claims 13, 18, 19, 22, 25 and 26 have been amended to more clearly show the document editing function of these embodiments and editing of document content, which is not disclosed in any combination of the cited prior art. These claims, as amended, not comprise the element of content editing, which is not disclosed in Kreitman et al, Lucas et al or any combination thereof.

Claims 20, 21, 23 and 24 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 905,992 by Lucas et al., in further view of U.S. Patent No. 5, 751,287 by Hahn et al. Claims 20 - 24 are dependent on claim 19, comprise all the limitations of claim 19 and are therefore allowable for the reasons stated above with regard to claim 19. This combination of references does not disclose any document content editing features that would render these claims, as amended, obvious.

In the examiner's Response to Arguments, the examiner states that Kreitman et al (col. 4, lines 62-63) teach a document editing function. However, this assertion is incorrect. This location in Kreitman et al refers to a prior art menu bar, such as is standard in any Microsoft Windows operating system, which has an edit menu that allows document editing (i.e., cut, paste, delete, etc.) while an application window is active with an application running. Kreitman et al

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and combinations of the other cited prior art do not teach document content editing through the use of an icon.

The examiner also responds with the assertion that Kreitman et al teach the use of object images that represent actual pages in a document. The applicant refers to “editable sub-elements” as pages or image frames that are the actual document content. The examiner is referring to “editable sub-elements” as information about the document such as file name, date, size, etc. These are two distinct elements. Kreitman et al teach the display of information relevant to a file. Applicant teaches editing the content of a file – actually changing the file itself – through the use of an icon.

Accordingly, applicant respectfully requests that the claims, as amended, be allowed in their current condition.

Respectfully submitted,

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